

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KRISTEN ARONOFF	:	
	:	
Plaintiff,	:	CIVIL ACTION
	:	
v.	:	
	:	NO.
TEMPLE UNIVERSITY, et al.	:	
	:	
Defendants.	:	

NOTICE OF REMOVAL OF CIVIL ACTION FROM STATE COURT

Defendants Temple University, whose proper corporate name is Temple University-Of The Commonwealth System of Higher Education, Dr. Carrie Snyder, Jeanette Rizzo and Dr. Rachael Stark (collectively, the “Temple Defendants”), by and through their undersigned attorneys, hereby remove this case, to this Court from the Philadelphia County Court of Common Pleas pursuant to 28 U.S.C. § 1331. In support, the Temple Defendants represent the following:

1. On or about August 22, 2024, Plaintiff commenced this action with a Writ of Summons in the Court of Common Pleas of Philadelphia County, Pennsylvania.
2. On or about October 25, 2024, the Temple Defendants filed upon Plaintiff a Rule to File a Complaint.
3. On or about November 15, 2024, Plaintiff filed her complaint in this action against the Temple Defendants.
4. In her complaint, Plaintiff alleges two causes of action under the American with Disabilities Act (42 U.S.C. § 12101, *et seq.*) for allegedly discriminating and retaliating against Plaintiff on the basis of her disability and failing to accommodate Plaintiff’s alleged disability (Complaint, Counts I and II).

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5. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331 because the action arises under the laws of the United States; that is, the Americans with Disabilities Act (42 U.S.C. § 12101, *et seq.*).

6. By reason of the foregoing and pursuant to 28 U.S.C. § 1441(c), the Temple Defendants desire and are entitled to have this case removed from the Philadelphia County Court of Common Pleas to the United States District Court for the Eastern District of Pennsylvania.

7. The Temple Defendants all consent to the removal of this action to this federal court.

8. In accordance with 28 U.S.C. § 1446(b), this Notice of Removal has been filed within 30 days after the Temple Defendants received service of Plaintiff's complaint.

9. The Eastern District of Pennsylvania is the district embracing the place where the Philadelphia Court of Common Pleas state court action is pending for purposes of 28 U.S.C. § 1441(a).

10. True and correct copies of this Notice of Removal are being promptly filed with the Philadelphia Court of Common Pleas, and served this date upon Plaintiff's counsel of record.

11. In accordance with 28 U.S.C. § 1446(a), the Temple Defendants attach a copy of all process, pleadings, and orders served upon them in this action as Exhibit A.

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WHEREFORE, the Temple Defendants request that this case be removed to the United States District Court for the Eastern District of Pennsylvania, that this Court accept jurisdiction of this action and that this action be placed on the docket of this Court for all further proceedings.

Dated: November 27, 2024

Respectfully submitted,

/s/ Neil J. Hamburg

NEIL J. HAMBURG, Esquire

KAY SICKLES, Esquire

ID. NO. 32175, 75159

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Attorneys for Defendants

Temple University, Dr. Carrie Snyder, Jeanette

Rizzo and Dr. Rachael Stark

CERTIFICATE OF SERVICE

I, Neil J. Hamburg, certify that Defendants' Notice of Removal of Civil Action from State Court together with all accompanying papers, have been filed electronically and are now available for viewing and downloading from the Court's Electronic Case Filing System. I further certify that a copy of the foregoing Notice and accompanying papers are being served by email on November 27, 2024, on the following:

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/s/ Neil J. Hamburg
NEIL J. HAMBURG